

Supplier Code of Conduct

1. Introduction

Optotune's Supplier Code of Conduct defines the basic requirements placed on the direct business partners of goods and services of the Optotune Group including its Affiliates¹ (hereinafter "Optotune") concerning their responsibilities towards their stakeholders and the environment. At Optotune, we aim to source ethically and responsibly. To uphold our standards, we require all direct business partners to comply with this Supplier Code of Conduct in addition to their necessary commitment towards their own supply chains.

2. General Commitment

As our business partner you must fully observe human rights, due diligence, and environmental protections in your own business operations and those of your direct business partners. We require that you establish an effective risk management system, to identify risks to people and the environment and to prevent, end, or minimize harms in your business and your direct business partners. You are responsible for risks or injuries you cause or contribute to within your supply chain.

You therefore declare herewith the following:

3. Anti-corruption obligation

- to tolerate no form of and not to engage in any form of corruption, bribery or money laundering be it by employees, third parties or agents, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law

4. Health, Safety and Environment

- to take responsibility for the health and safety of your employees in accordance with the applicable statutory and international standards to provide safe working conditions;
- to minimize waste as well as air, soil and water emissions, and also contribute to the recycling and reuse of materials and products;
- to apply international and national standards to the handling, storage, and disposal of hazardous waste as well as handle chemicals harm-free to the environment and continuously improve energy efficiency;
- to use reasonable efforts to address social, environmental and climate risks in your own supply chain and to make reasonable efforts that your suppliers adhere to comparable requirements.

5. Human Rights and Labour Practices

- to strictly refrain from any use of slavery, servitude, forced or compulsory labor and human trafficking, or child or forced labour²;
- to promote equal opportunities for all your employees irrespective of ethnic background, nationality, social background, disabilities, sexual orientation, political or religious conviction, gender or age;
- to respect the personal dignity, privacy and rights of each individual and refuse to tolerate any unacceptable treatment of employees, such as psychological, sexual harassment or discrimination;
- to comply with the maximum permitted number of working hours³;
- to provide fair remuneration including overtime compensation and to guarantee at least the applicable national legal minimum wage according to the applicable laws and regulations;
- to recognize employees' rights to assembly, association, and collective bargaining.

6. Fair Business Practice

- to avoid behavior and practices which could trigger conflicts of interest;
- to abide by anti-trust laws and uphold fair competition standards;
- to respect intellectual property rights and safeguard customer and supplier privacy, data and information.

¹ "Affiliates" means for the purpose of this Supplier's Declaration means any existing or future entity: (i) directly or indirectly controlling a party; (ii) under the same direct or indirect control as a party; or (iii) directly or indirectly controlled by a party. For the purposes of this definition "control" means (i) the ownership of the majority of a company's voting stock or the majority of its voting rights, (ii) the right directly or indirectly to appoint the majority of the members of the managing or administrative board (or of a similar managing authority with the power to represent the company) or (iii) the power to direct, or cause the direction of, the management by contract or otherwise

² according to the ILO Conventions 138 and 182 as well as 29 and 105.

³ according to the ILO Conventions 1 and 30